

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DISTRICT

TUVQIPÄÜÖPVOÖ
Kevin H. Sharp

UNITED STATES OF AMERICA)
)
)
 v.)) CASE NO. 3:13-00118
)) JUDGE SHARP
MICHAEL MANCIL BROWN,)

**MOTION OF THE UNITED STATES FOR LEAVE TO REPLY
TO DEFENDANT'S RESPONSE TO MOTION IN LIMINE BY UNITED STATES**

Comes now the United States of America by and through the Assistant Attorney General for the United States Department of Justice, and respectfully moves the Court for leave to file a reply to defendant Brown's Response to the Motion *in Limine* by the United States to Admit Evidence of Other Wrongs and Acts Pursuant to Evidence Rule 404(b).

Although a reply to a response often is unnecessary, in this case ten months intervened between the filing of the government's motion *in limine* and the response by defendant Brown. Additional information supporting the admission of other acts evidence has come to the attention of the United States during that time.

Further, defendant Brown cited several cases in his response that are distinguishable from the case before this Court. It may assist the Court for the United States to address the distinctions between those cases and this one.

Further, defendant Brown has questioned the ability of the United States to reliably prove the conduct attributed to him in 2009. The United States is prepared to respond to that question.